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UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

**In re**

**THUAN-VU D HO,**

**Debtor.**

**KARI SILVA BOWYER, Trustee of  
the Bankruptcy Estate of  
Thuan-Vu D Ho,**

**Plaintiff,**

**vs.**

**LUU PHUONG NGUYEN aka LUUPHUONG  
NGUYEN, BAO QUOC NGUYEN and  
MINHDUC T. LUU,**

**Defendants.**

**Case No. 14-50354 ASW-7  
Chapter 7**

**ADVERSARY PROCEEDING  
NO.**

**COMPLAINT FOR INJUNCTIVE  
RELIEF, TO AVOID FRAUDULENT  
TRANSFERS, TO AVOID POST-  
PETITION TRANSFERS, FOR AN  
ACCOUNTING AND TURNOVER OF  
PROPERTY OF THE ESTATE AND  
FOR DECLARATORY RELIEF**

**COMES NOW** plaintiff, Kari Silva Bowyer, trustee in bankruptcy,  
and respectfully alleges the following:

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Complaint for Injunctive Relief,  
To Avoid Fraud. Transfer, etc.

1 **JURISDICTION AND VENUE**

2 1. This action is an adversary proceeding as defined by  
3 Federal Rules of Bankruptcy Procedure (hereinafter "FRBP") 7001(1),  
4 7001(2), 7001(3) and 7001(9), including a proceeding for injunctive  
5 relief, and is brought pursuant to 11 U.S.C. §§ 105(a) 362(a),  
6 363(h), 541(a), 542(a), 548(a), 549(a), 550(a) and 551.

7 2. This court has jurisdiction over this adversary  
8 proceeding pursuant to 28 U.S.C. §§ 157 and 1334(b). Venue is  
9 proper pursuant to 28 U.S.C. §1409.

10 3. This adversary proceeding is a core proceeding as that  
11 term is defined at 28 U.S.C. §§ 157(b)(2)(A), (E), (H) and (O) in  
12 that it is an action, among other things, for a determination of an  
13 interest in property concerning the administration of the estate,  
14 affecting liquidation of assets of the estate, for turnover of  
15 property of the estate, and to determine, avoid and recover  
16 fraudulent conveyances. Plaintiff consents to the entry of a final  
17 order or judgment by the bankruptcy court.

18 **GENERAL ALLEGATIONS**

19 4. On January 30, 2014, a voluntary petition for relief  
20 under Chapter 7 of the Bankruptcy Code was filed by debtor, Thuan-  
21 Vu D Ho ("Debtor"), in the above-captioned court as Case No. 14-  
22 50354 ASW-7 ("Bankruptcy Case") and an order for relief entered.

23 5. On February 14, 2014, a voluntary petition for relief  
24 under Chapter 7 of the Bankruptcy Code was filed by Thuan-Vu Dinh  
25 Ho, DMD, Inc. dba Prima Dental Care (the "Corporation") in which  
26 Debtor is sole shareholder, in the Northern District of California,  
27 San Francisco Division, as Case No. 14-30226 (the "Corporate  
28 Bankruptcy Case") and an order for relief was entered.

1           6. In connection with the filing of the Bankruptcy Case,  
2 Debtor listed a debt of \$996,935.79 as wholly unsecured on Schedule  
3 D entered on the court docket as document #1, page 14, which debt  
4 Plaintiff is informed and believes was incurred by the Corporation  
5 in or about 2006, that Debtor guaranteed the obligation, and with  
6 respect to which the Corporation defaulted as early as May 2012.

7           7. Kari Silva Bowyer ("Plaintiff"), is the duly appointed,  
8 qualified and acting trustee of the estate of the Debtor.

9           8. Debtor is an individual debtor under Chapter 7 of the  
10 Bankruptcy Code in the Northern District of California.

11           9. Plaintiff is informed and believes and thereon alleges  
12 that defendant, Luu Phuong Nguyen aka Luuphuong Nguyen  
13 ("Luuphuong"), is and at all times relevant herein was, an  
14 individual and either the wife or ex-wife of the Debtor.

15           10. Plaintiff is informed and believes and thereon alleges  
16 that defendants, Bao Quoc Nguyen Minhduc T. Luu (hereinafter  
17 collectively "Parents"), are and at all times relevant herein were  
18 individuals, Debtor's former in-laws, and Luuphuong's parents.

19           11. Plaintiff is informed and believes and thereon alleges  
20 that Debtor and Luuphuong were married on or about November 17,  
21 2008, and that they were separated on January 5, 2013.

22           12. Plaintiff is informed and believes and thereon alleges  
23 that any and all earnings acquired by either Debtor or Luuphuong  
24 during their marriage including the period from November 17, 2008  
25 through and including January 5, 2013 (hereinafter referred to as  
26 "Earnings Acquired During Marriage"), were at all times community  
27 property and therefore, property of the bankruptcy estate.

28 ///

1 13. Plaintiff is informed and believes and thereon alleges  
2 that on or about April 2, 2013, Luuphuong filed a Petition for  
3 Dissolution of Marriage in the Santa Clara Superior Court, as Case  
4 No. 1-13-FL-164502 ("Family Law Case"), in which Luuphuong is  
5 Petitioner and Debtor is Respondent.

6 14. Plaintiff is informed and believes and thereon alleges  
7 that on or about November 13, 2009, Debtor and Luuphuong purchased  
8 the real property located at 3482 Lapridge Lane, San Jose,  
9 California, Assessor's Parcel No. 414-30-117 ("the Lapridge  
10 Property") for the sum of \$630,000.00.

11 15. Plaintiff is informed and believes and thereon alleges  
12 that on or about February 4, 2013, less than one (1) year prior to  
13 the filing of the Bankruptcy Case, Debtor executed an Interspousal  
14 Transfer Grant Deed, recorded February 14, 2013, as document number  
15 22093512, in the Santa Clara County Recorder's Official Records, a  
16 copy of which is attached hereto as Exhibit "A", without exhibit,  
17 and incorporated herein as though set forth at length, pursuant to  
18 which Debtor transferred all of his right, title and interest in  
19 the Lapridge Property to Luuphuong, a married woman as her sole and  
20 separate property.

21 16. Plaintiff is informed and believes and thereon alleges  
22 that prior to Debtor's marriage to Luuphuong, Luuphuong and her  
23 Parents purchased the real property located at 1632 South White  
24 Road, San Jose, California, APN 647-31-004 ("the White Road  
25 Property"), the legal description of which is as follows:

26 LOT 436, as delineated upon that certain Map entitled  
27 "Tract No. 2306", filed for record in the Office of the  
28 Recorder of the County of Santa Clara, State of  
California, on July 20<sup>th</sup>, 1959 in Book 109 of Maps, at  
Pages 23 and 24.

1        17. Plaintiff is informed and believes and thereon alleges  
2 that on or about June 5, 2013, less than one (1) year prior to the  
3 filing of the Bankruptcy Case, a Judgment of Dissolution was filed  
4 in the Family Law Case ("Judgment of Dissolution").

5        18. The Judgment of Dissolution provided, in relevant part,  
6 for Luuphuong to be awarded, as her sole and separate property,  
7 various property including, but not limited to the Lapridge  
8 Property, the White Road Property, a 2005 Toyota Camry, a 2010  
9 Toyota Highlander ("Highlander"), any and all credit cards or other  
10 debts in Wife's name alone, and all financial accounts in her name,  
11 or jointly with another other than with Debtor.

12        19. The Judgment of Dissolution also provided, in relevant  
13 part, for Debtor to be awarded, as his sole and separate property,  
14 a Cancun timeshare, all furniture, furnishings, and personal  
15 property belongings including jewelry currently in his possession,  
16 the business known as "Prima Dental Care" including any and all  
17 assets and/or liabilities thereon, any and all credit cards or other  
18 debts in Husband's name alone, and all financial accounts in  
19 Husband's name, or jointly with another other than Wife.

20        20. Plaintiff is informed and believes and thereon alleges  
21 the Lapridge Property was purchased with Earnings Acquired During  
22 Marriage, and that at all times thereafter, all mortgage payments  
23 and improvements to the Lapridge Property, if any, were paid from  
24 Earnings Acquired During Marriage which were community property.

25        21. Plaintiff is informed and believes and thereon alleges  
26 the Lapridge Property was at all times a community property asset  
27 and property of the bankruptcy estate that Debtor transferred to  
28 Luuphuong for no consideration.

1        22. Plaintiff is informed and believes and thereon alleges  
2 the Highlander was purchased with Earnings Acquired During  
3 Marriage, and that at all times thereafter through Luuphuong's  
4 separation from Debtor, all loan payments were paid from Earnings  
5 Acquired During Marriage which were community property, and that  
6 the Highlander was and is at all times a community property asset  
7 and property of the bankruptcy estate.

8        23. Plaintiff is informed and believes and thereon alleges  
9 that subsequent to the filing of the Bankruptcy Case, Luuphuong  
10 sold the Lapridge Property on or about April 4, 2014, for the sum  
11 of \$950,000.00 ("Proceeds of Sale") and that the Proceeds of Sale  
12 was and is at all times a community property asset and property of  
13 the bankruptcy estate.

14        24. Plaintiff is informed and believes and thereon alleges  
15 that from the Proceeds of Sale, the mortgage that was paid off in  
16 an less than \$500,000.00 ("the Mortgage").

17        25. Plaintiff is informed and believes and thereon alleges  
18 that from the Proceeds of Sale, Luuphuong transferred \$150,000.00  
19 to her Parents in repayment of a loan

20        26. Plaintiff is informed and believes and thereon alleges  
21 that notwithstanding the transfer of \$150,000.00 to her Parents,  
22 Luuphuong still has access her Parents' financial accounts into  
23 which the \$150,000.00 was deposited.

24        27. Plaintiff is informed and believes and thereon alleges  
25 that from the Proceeds of Sale, Luuphuong has since used  
26 approximately \$70,000.00 of the Proceeds of Sale to pay her student  
27 loan debt and approximately \$10,000.00 of the Proceeds of Sale to  
28 pay off the car loan secured by the Highlander.

1 28. Plaintiff is informed and believes and thereon alleges  
2 that from the \$950,000 Proceeds of Sale, the amount remaining is  
3 approximately \$100,000.00 (hereinafter referred to as "the  
4 Remaining Proceeds of Sale").

5 29. Plaintiff is informed and believes and thereon alleges  
6 that as of the filing of the Family Law Case, as well as the filing  
7 of the Bankruptcy Case, there were various financial accounts held  
8 in Luuphuong's name, either alone or together with another person,  
9 into which community property was deposited having been derived  
10 from Earnings Acquired During Marriage.

11 **FIRST CLAIM FOR RELIEF**  
12 **For Injunctive Relief against All Defendants**  
13 **[11 U.S.C. §105(a) and 362(a)]**

14 30. Plaintiff realleges and incorporates the allegations  
15 contained in paragraphs 1 through 25 inclusive, as though set forth  
16 at length.

17 31. Plaintiff is informed and believes and thereon alleges  
18 that unless the Defendants, Luuphuong and her Parents, are enjoined  
19 and restrained by order of this Court, from taking any action to  
20 transfer, hypothecate or otherwise use or distribute any and all  
21 of the Proceeds of Sale and/or Remaining Proceeds of Sale in their  
22 possession and/or control, pending resolution of the within  
23 adversary proceeding, that great and irreparable injury may be  
24 caused to the estate because the estate will lose a valuable asset,  
25 its interest in the Proceeds of Sale from the Lapridge Property.

26 32. Plaintiff is informed and believes and thereon alleges  
27 that she has no adequate remedy at law for the injuries which the  
28 estate will suffer as a result of the possible actions of Luuphuong  
and her Parents with regard to the Proceeds of Sale.

1       **WHEREFORE**, Plaintiff requests judgment as set forth below.

2                               **SECOND CLAIM FOR RELIEF**  
3       **Fraudulent Transfer against Defendant Luuphuong Nguyen**  
4                               **[11 U.S.C. §§ 548(a), 550(a) and 551]**

5       33. Plaintiff reaalleges and incorporates the allegations  
6 contained in paragraphs 1 through 32 inclusive, as though set forth  
7 at length.

8       34. The transfer of the Lapridge Property by Debtor to  
9 Luuphuong referred to in paragraphs 15 and 18 were made within two  
10 (2) years before the filing of the Bankruptcy Case.

11       35. Plaintiff is informed and believes and thereon alleges  
12 the transfer referred to in paragraphs 15 and 18 were made by the  
13 Debtor with the actual intent to hinder, delay and defraud  
14 creditors of the Debtor.

15       36. Plaintiff is informed and believes and thereon alleges  
16 the transfer referred to in paragraphs 15 and 18 constituted a  
17 transfer of property of the Debtor to Luuphuong for which the  
18 Debtor received no consideration, or if the Debtor received any  
19 consideration, such consideration was not of a reasonably  
20 equivalent value.

21       37. Plaintiff is informed and believes and thereon alleges  
22 the transfer referred to in paragraphs 15 and 18 were made and  
23 incurred by the Debtor (i) when the Debtor was insolvent and/or  
24 such transfer rendered the Debtor insolvent and/or (ii) were made  
25 and incurred at such time as Debtor was engaged in or about to be  
26 engaged in a business for which his remaining assets were  
27 unreasonably small in relation to his business, and/or (iii) was  
28 made at such time as the Debtor intended to incur and/or believed



1 or reasonably should have believed that he would incur debts beyond  
2 his ability to pay as they became due.

3 38. Plaintiff is entitled to avoid and preserve such transfer  
4 for the benefit of the estate pursuant to the provisions of 11  
5 U.S.C. §§ 548(a), 550(a) and 551.

6 **WHEREFORE**, Plaintiff prays for judgment as set forth below.

7 **THIRD CLAIM FOR RELIEF**

8 **Post-Petition Transfer against Defendants Luuphuong Ngyuen,**  
9 **Bao Quoc Nguyen and Minhduc T. Luu**  
10 **[11 U.S.C. §§ 549(a), 550(a) and 551]**

11 39. Plaintiff reaalleges and incorporates the allegations  
12 contained in paragraphs 1 through 38 inclusive, as though set forth  
13 at length.

14 40. Plaintiff is informed and believes and thereon alleges  
15 that at the time of the transfers of property by Luuphuong referred  
16 to in paragraphs 23 through 27 above, including but not limited to  
17 the transfer and sale of the Lapridge Property, the transfer of the  
18 Proceeds of Sale to Luuphuong's Parents, and to pay Luuphuong's  
19 student loan and car loan secured by the Highlander, Luuphuong had  
20 full knowledge of the commencement of the Bankruptcy Case.

21 41. Plaintiff is informed and believes and thereon alleges  
22 the transfers referred to in paragraphs 23 through 27 above  
23 constituted transfers of property of the Debtor to Defendants,  
24 Luuphuong and her Parents, for which the Debtor received no  
25 consideration, or if the Debtor received any consideration, such  
26 consideration was not of a reasonably equivalent value.

27 42. Plaintiff is entitled to avoid and preserve such  
28 transfers for the benefit of the estate pursuant to the provisions  
of 11 U.S.C. §§ 549(a), 550(a) and 551.

1       **WHEREFORE**, Plaintiff prays for judgment as set forth below.

2                               **FOURTH CLAIM FOR RELIEF**

3                               **Declaratory Relief**

4       **[Fed Rule of Bankruptcy Proc. 7001 and 11 U.S.C. §541(a) (2)]**

5       43. Plaintiff rea alleges and incorporates the allegations in  
6 paragraphs 1 through 42, inclusive, as though set forth at length.

7       44. Plaintiff is informed and believes and thereon alleges  
8 that the property referred to in paragraphs 15, 18 and 20 through  
9 23 above, including but not limited to the Lapridge Property and  
10 the Highlander were either acquired with Earnings Acquired During  
11 Marriage, consisted of Earnings Acquired During Marriage, and/or  
12 the debts paid with Earnings Acquired During Marriage were secured  
13 by said property, and that pursuant thereto, said property and/or  
14 an interest in said property are community property assets and are  
15 property of the bankruptcy estate.

16       45. Plaintiff is informed and believes and thereon alleges  
17 that Luuphuong claims some right, title and interest in the  
18 property referred to in paragraphs 15, 18 and 20 through 23 above.

19       46. Plaintiff is informed and believes and thereon alleges  
20 that Luuphuong disputes the contentions alleged in paragraphs 15  
21 and 18 and 20 through 22 above.

22       47. An actual controversy exists between Plaintiff and  
23 Defendant with regard to the validity, nature and extent of their  
24 respective interests in various property referred to in paragraphs  
25 15, 18 and 20 through 22 above including but not limited to the  
26 Lapridge Property and the Highlander.

27       48. It is necessary that this Court declare the actual rights  
28 and obligations of the parties and make a determination as to their  
respective interests in various property referred to in paragraphs

1 15, 18 and 20 through 22 above including but not limited to the  
2 Lapridge Property and the Highlander.

3 **WHEREFORE**, Plaintiff prays for judgment as set forth below.

4 **FIFTH CLAIM FOR RELIEF**

5 **For an Accounting and Turnover of Property of the Estate**  
6 **against Defendant Luuphuong Nguyen**  
7 **[Fed Rule of Bankruptcy Proc. 7001 and]**  
8 **[11 U.S.C. §§ 541(a)(2) and 542(a)]**

9 49. Plaintiff rea alleges and incorporates the allegations in  
10 paragraphs 1 through 48, inclusive, as though set forth at length.

11 50. Plaintiff is informed and believes and thereon alleges  
12 that from at least as early as January 5, 2013, the date of the  
13 parties' separation, and continuing subsequent to the filing of the  
14 Bankruptcy Case, Luuphuong has been in possession of certain  
15 property of the estate, including but not limited to the Lapridge  
16 Property and the Proceeds of Sale and the Remaining Proceeds of  
17 Sale therefrom, and that she retains the same based upon the  
18 transfer by Debtor to Luuphuong of the Lapridge Property, the  
19 Highlander and other property referred to in paragraphs 15, 18 and  
20 20 through 22 above, as well as the transfer to Luuphuong's Parents  
21 referred to in paragraph 26 above.

22 51. The property described above constitutes property which  
23 the Plaintiff herein may use, sell or lease pursuant to 11 U.S.C.  
24 §363.

25 52. In the event this Court avoids the transfer of the  
26 Lapridge Property and other property referred to in paragraphs 15  
27 and 18 above, then it is necessary that this Court order Luuphuong  
28 to account for any and all monies obtained by Luuphuong in  
connection with Lapridge Property as well as any other property and

1 any transfers from and after January 5, 2013, as well as any and  
2 all monies currently on deposit in said accounts, and to turn such  
3 funds over to Plaintiff.

4 **WHEREFORE**, Plaintiff prays for judgment as set forth below.

5 **SIXTH CLAIM FOR RELIEF**

6 **For an Accounting and Turnover of Property of the Estate**  
7 **against Defendants Luuphuong Nguyen,**  
8 **Bao Quoc Nguyen and Minhduc T. Luu**  
9 **[Fed Rule of Bankruptcy Proc. 7001 and]**  
10 **[11 U.S.C. §§ 541(a)(2) and 542(a)]**

11 53. Plaintiff reaalleges and incorporates the allegations in  
12 paragraphs 1 through 52, inclusive, as though set forth at length.

13 54. Plaintiff is informed and believes and thereon alleges  
14 that from some time after April 4, 2014 through the present,  
15 defendants, Luuphuong and/or her Parents, Bao Quoc Nguyen and  
16 Minhduc T. Luu, have been in possession of \$150,000.00 from the  
17 Proceeds of Sale based upon the transfer of said property to them  
18 by Luuphuong referred to in paragraphs 25 and 26 above.

19 55. The property described above constitutes property which  
20 the Plaintiff herein may use, sell or lease pursuant to 11 U.S.C.  
21 §363.

22 56. In the event this Court avoids the transfer of the  
23 Lapridge Property referred to in paragraphs 15 and 18 above, then  
24 it is necessary that this Court order defendants Luuphuong, Bao  
25 Quoc Nguyen and Minhduc T. Luu to account for any and all monies  
26 transferred to them by Luuphuong from the Proceeds of Sale from and  
27 after April 4, 2014, and to turn such funds over to Plaintiff.

28 **WHEREFORE**, Plaintiff prays for judgment as follows:

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1           1.    On Plaintiff's first claim for relief, for injunctive  
2 relief in the nature of a temporary restraining order, preliminary  
3 injunction and permanent restraining order against defendants,  
4 Luuphuong and her Parents, which prohibits them from taking any  
5 action to transfer, hypothecate or otherwise use or distribute any  
6 and all of the Proceeds of Sale and/or Remaining Proceeds of Sale  
7 in their possession and/or control, pending resolution of the  
8 within adversary proceeding, pursuant to 11 U.S.C. §105(a);

9           2.    On Plaintiff's second claim for relief, for an order  
10 avoiding the Interspousal Transfer Grant Deed recorded February 14,  
11 2013, in the Santa Clara County Official Records, as document  
12 number 22093512, pursuant to which Debtor transferred all of his  
13 right, title and interest in the Lapridge Property to Luuphuong,  
14 a married woman, as her sole and separate property, and preserving  
15 such transfer for the benefit of the estate, pursuant to 11 U.S.C.  
16 §§ 548(a), 550(a) and 551;

17           3.    On Plaintiff's second claim for relief, for an order  
18 avoiding the transfer of the Lapridge Property as provided for in  
19 the Judgment of Dissolution, pursuant to which Debtor transferred  
20 all of his right, title and interest in the Lapridge Property to  
21 defendant Luuphuong, and preserving such transfer for the benefit  
22 of the estate, pursuant to 11 U.S.C. §§ 548(a), 550(a) and 551;

23           4.    On Plaintiff's third claim for relief, for a money  
24 judgment in favor of Plaintiff and against defendant Luuphuong for  
25 the principal sum of \$950,000.00 reduced by costs of sale and other  
26 secured obligations to be approved by the Court, subject to proof,  
27 representing the net Proceeds of Sale received by defendant  
28 Luuphuong as a result of the post-petition transfer of the Lapridge

1 Property, together with lawful interest, according to proof,  
2 pursuant to 11 U.S.C. §§ 549(a), 550(a) and 551;

3 5. On Plaintiff's third claim for relief, for a money  
4 judgment in favor of Plaintiff against defendants, Bao Quoc Nguyen  
5 and Minhduc T. Luu, for the principal sum of \$150,000.00,  
6 representing the monies received by said defendants as a result of  
7 the post-petition transfer of said proceeds from the Proceeds of  
8 Sale of the Lapridge Property from defendant Luuphuong, together  
9 with lawful interest, according to proof, pursuant to 11 U.S.C. §§  
10 549(a), 550(a) and 551;

11 6. On Plaintiff's fourth claim for relief, for equitable  
12 relief in the form of a judgment against defendant Luuphuong  
13 declaring that the Lapridge Property and the Proceeds of Sale  
14 therefrom was at all times community property belonging to Debtor  
15 and Luuphuong and therefore, an asset of the bankruptcy estate  
16 pursuant to 11 U.S.C §541(a) (2);

17 7. On Plaintiff's fourth claim for relief, for equitable  
18 relief in the form of a judgment against defendant Luuphuong  
19 declaring that the Highlander was at all times community property  
20 belonging to Debtor and Luuphuong and therefore, an asset of the  
21 bankruptcy estate pursuant to 11 U.S.C §541(a) (2);

22 8. On Plaintiff's fifth claim for relief, for a judgment  
23 against defendant Luuphuong requiring Luuphuong to provide an  
24 accounting of the Proceeds of Sale from the sale of the Lapridge  
25 Property from and after April 4, 2014 through and including entry  
26 of judgment, pursuant to 11 U.S.C. §542(a);

27 9. On Plaintiff's fifth claim for relief, for a judgment  
28 against defendant Luuphuong requiring Luuphuong to provide an

1 accounting of any and all monies on deposit in the financial  
2 accounts in her name as of January 5, 2013, through and including  
3 the filing of the Bankruptcy Case, pursuant to 11 U.S.C. §542(a);

4 10. On Plaintiff's sixth claim for relief, for a judgment  
5 against defendant Luuphuong and against defendants, Bao Quoc Nguyen  
6 and Minhduc T. Luu, requiring said defendants to provide an  
7 accounting of the \$150,000.00 transferred by defendant Luuphuong  
8 to her Parents, from and after April 4, 2014 through and including  
9 entry of judgment, pursuant to 11 U.S.C. §542(a);

10 11. For costs of suit incurred herein including reasonable  
11 attorneys fees; and,

12 12. For such other and further relief as the Court deems just  
13 and proper.

14  
15 Dated: April 16, 2014

LAW OFFICE OF MARLENE G. WEINSTEIN

16  
17 By: /s/ Marlene Gay Weinstein

18 MARLENE G. WEINSTEIN

19 Attorney for Plaintiff

20 Kari Silva Bowyer, Trustee  
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